# PRIVACY STATEMENT

# **Your Privacy Rights**

Zorka's Travel and Logistics Services, LLC (hereinafter referred to as "Zorka's Travel," "we," "us" and "our") values your privacy. This Privacy Statement states the principles and practices that apply to our collection and use of information that you, our clients and prospective clients (hereinafter referred to as "you" and "your") provide to us, whether in person, by telephone, mail or email, or through our website, www.zorkastravel.com (the "Website"). In terms of our broad presence on the world wide web, this Privacy Statement only governs our collection of personal information through this Website and does not apply to any other website, url or online service used or licensed by Zorka's Travel.

By using the Website, you explicitly accept, without limitation or qualification, our practices surrounding the collection, use, and sharing of personal information provided by you in the manner described in this Privacy Statement. If you do not agree with the terms of this Privacy Statement, please do not access, browse, or use the Website.

#### **How We Collect and Use Personal Information**

Some information is explicitly provided to us by you, while other information, such as your IP address, is gathered automatically as you use our services. You may voluntarily provide certain personal identifying information to us in connection with your use of our interactive web portals, your purchase of travel-related products, any signup incentives or promotions you elect to participate in, newsletter or other subscriptions, and services (all of which will be referred to as "Personal Information"). If you choose to provide us with Personal Information by opting in, you consent to our collection of that information and to the transfer and storage of that information on our servers located in the United States. Personal Information includes all information you voluntarily provide to us, whether in person, by telephone, mail or e-mail, or on this Website, such as:

- (1) your contact information (e.g. name, telephone number, passport number, driver's license or state identification number, and postal and e-mail addresses);
- (2) financial information (e.g. credit card number, security code, cardholder name, billing address, and expiration date);
- (3) information related to your travel profile (e.g. booking history, travel preferences and interests, identity of any travel companions, airline and hotel and rent-a-car loyalty program information); and
- (4) information related to disability, medical condition and special health accommodations.

We may use your Personal Information to provide you with travel-related information, including providing you with responses to requests for travel services, travel notifications, travel advisories or warnings, travel confirmations and updates, as well as managing your account, processing bills, and/or personalized mailings (electronic or otherwise) or other communications that you consent to receive, and to prevent potentially prohibited or illegal activity, resolve disputes and collect fees.

# To Whom is Your Personal Information Disclosed

Zorka's Travel may share your information with third parties to facilitate your travel plans or requests for information. We may share your Personal Information (only to the extent reasonably necessary or as required by the circumstances) and Aggregated Data, when applicable, with the following parties:

- (1) Third party vendors, web hosting service providers, travel service providers, host travel agencies and other reputable travel industry intermediaries in order for such parties to: (i) assist Zorka's Travel in providing the requested travel services to you, (ii) assist Zorka's Travel in personalizing your experience which includes informing you of future travel opportunities and offers (iii) provide aggregate reporting to Zorka's Travel and certain third parties (using only Aggregated Data and not individual Personal Information when provided to third parties), and (iv) provide emergency client assistance if applicable and eligible.
- (2) Third party vendors, travel service providers, host travel agencies and other travel industry intermediaries which provide certain services or functions requested by you and/or which fulfill your requested transactions, including but not limited to, cruise lines, airlines, hotels, destination management companies, event sites, tour operators, travel insurance companies, ground transportation providers, and car rental companies, as well as service providers who assist with our business operations (such as fraud investigations, bill collection and affiliate and award programs).
- (3) Other third parties to whom you explicitly ask us to send your information (or about whom you are otherwise explicitly notified and consent to when using a specific service).
- (4) The appropriate parties if it is requested by a government agency or law enforcement personnel or if we are otherwise required by law to disclose it in response to subpoenas, court orders, or other legal process, to establish or exercise our legal rights, to defend against legal claims, or as otherwise required by law (in which case, we reserve the right to raise or waive any legal objection available to us).
- (5) Other appropriate entities, such as our successors or assigns, should we undergo a corporate transaction, such as a divestiture, merger, consolidation, or asset sale.
- (6) The appropriate parties when we believe in good faith that disclosure is required to investigate or prevent suspected illegal activity, to protect the security, property, assets and/or rights of Zorka's Travel from unauthorized use or misuse of the Website or anything found at the Website.

Once your Personal Information has been shared with a non-affiliated third party in accordance with this Privacy Policy, we cannot control how that third party collects, uses or shares your Personal Information and as such, we will thereafter have no responsibility for its use. Protection of your Personal Information in the possession of any such third party shall be governed by the Privacy Statement of that third party.

# **Third Party Services**

Zorka's Travel may provide third party links, or otherwise cooperate with third party service providers, to provide you with access to travel transaction management resources such as an online booking engine or an electronic document execution program. These online resources are independently owned and operated by third party providers and are not under our control. Zorka's Travel may provide access to these resources as a service to you, and is not responsible for their operation, content, information practices or any link contained in a linked site. These resources often gather personally identifiable information and financial information from you to complete your booking requests. And our service may include providing some of your Personal Information to the third party provider to help streamline the booking process.

## **Third Party Privacy Policies**

Vendors, suppliers of travel services, host travel agencies, other travel intermediaries, and other third parties with whom we share your Personal Information may have their own privacy policies accessible which may be on their own websites. We strongly encourage you to review those privacy notices. Zorka's Travel's Privacy Statement does not apply to these vendors, suppliers of travel services, host travel agencies and other travel intermediaries, and other third parties, as their policies may differ from our Privacy Statement.

### **Cookies**

When you visit or access the Website, our systems or our web hosting service provider may send one or more cookies (small text files containing a string of characters) to your computer that uniquely identifies your browser. Cookies alone do not tell us your e-mail address or other Personal Information unless you choose to provide this information to us by, for example, using certain interactive features on our Website. We use cookies to improve the quality of the Website by storing user preferences and tracking user trends. Most web browsers accept cookies automatically, but can be configured not to do so or to notify the user when a cookie is being sent. If you wish to disable cookies, refer to your browser help menu to learn how to disable cookies. Please note that if you disable cookies, you may not be able to use some customized travel planning features available on the Website. The information contained in or collected by cookies is not considered Personal Information for the purposes of this Privacy Statement.

### **Aggregated Information**

In addition to any Personal Information you may voluntarily provide to us, this Website also collects general information regarding visitors and users of this Website as it relates to their use of the Website (referred to herein as "Aggregated Data"). This information is collected automatically each time a user navigates our Website. The term Aggregated Data includes, but is not limited to, such information as traffic patterns, number, frequency and duration of visits to certain pages, visits from other websites or to third-party websites linked to this Website, use of particular services and interest in services, information or features of the Website or other parties made available through or found at the Website. This information is anonymous and is useful for improving the content and navigational tools of our Website. Aggregated Data may also include information or data obtained from you or other sources, which has been combined with or compiled from other information or data in such a manner to no longer be personally identifiable or linked to an individual. Aggregated Data is not considered Personal Information for the purposes of this Privacy Statement.

# Children

Zorka's Travel does not sell travel or other services for purchase by children. This is a general audience website and does not offer services directed to children. Should a child whom we know to be under 18 send Personal Information to us, we will use that information only to respond directly to that child to inform him or her that we must have parental consent before receiving his or her personal information.

California Residents—Your California Privacy Rights. When California customers provide Personal Information to a business, they have the right to request certain disclosures if the business shares Personal Information with third parties for the third parties' own direct marketing purposes. The law provides that a company that has a privacy policy that provides consumers with choice regarding sharing Personal Information with third parties for those third parties' direct marketing purposes may instead provide California customers with information on how to exercise that choice. As stated in this Privacy Statement, we do not share information with third parties for those third parties' own direct marketing purposes without your consent. California customers may request further information about our compliance with this law by e-mailing bsalvador@zorkastravel.com . You must put the statement "Your

California Privacy Rights" in the subject field of your e-mail. You must include your name, street address, city, state, and zip code. We are not responsible for requests that are not labeled or sent properly, or do not have complete information. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this e-mail address.

## **European Users**

Zorka's Travel is in compliance with all applicable data protection laws in the European Economic Area (EEA), which, if applicable to you, include the following rights provided by the General Data Protection Regulation (GDPR):

- Right to Information
- Right to Access
- Right to Rectification
- Right to Withdraw Consent
- Right to Object
- Right to Object to Automated Processing
- Right to be Forgotten
- Right for Data Portability

Information collected within the EEA may be transferred, stored, and processed outside of the EEA for the purposes described in this Privacy Statement. Where we transfer store, and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection.

To learn more about your rights, and for more information on the standards we abide by under GDPR, please visit the <u>GDPR website</u> here.

### **Revisions to Privacy Statement**

We may revise or update the Website or any of our policies and procedures without prior notice. We will post a notice on the Website to advise you of any significant changes to this Privacy Statement and indicate on the "Last Updated" legend at the bottom of this Privacy Statement when it was most recently updated. Your continued use of the Website signifies your continued assent to the terms of this Privacy Statement, as updated or amended at that time.

### **Questions, Comments, Contact Information**

If you have any questions or concerns about this Privacy Statement or the way we use your Personal Information, or if you want to contact us about modifying or deleting your personal profile please feel free to email us at <a href="mailto:bsalvador@zorkastravel.com">bsalvador@zorkastravel.com</a> or call us at +1 (515) 999 6752.

Your online privacy is highly important to us and we welcome your comments or questions.

This Privacy Statement is effective as of April 14, 2021.

Last Updated: April 14, 2021.